



Department of Energy

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OCT 27 1999

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0072-00

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

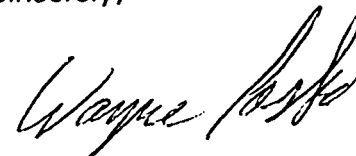
Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY
AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE
VERIFICATION OF TREATMENT REPORT FOR THE AREA 1, PHASE II TRAP RANGE
STABILIZATION PROJECT**

Enclosed is the response to the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) comments on the Verification of Treatment Report (VTR) for the Area 1, Phase II (A1PII) Trap Range Stabilization Project. As a result of the OEPA comment, please replace Page 4 of the subject report with the enclosed changed page.

If you have any questions or concerns regarding these documents, please contact Robert Janke at (513) 648-3124.

Sincerely,


for Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosure

Mr. James A. Saric
Mr. Tom Schneider

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OCT 27 1999

cc w/enclosure:

R. J. Janke, OH/FEMP

G. Jablonowski, USEPA-V, SRF-5J

T. Schneider, OEPA-Dayton (three copies of enclosure)

F. Bell, ATSDR

M. Schupe, HSI GeoTrans

R. Vandegrift, ODH

F. Barker, Tetra Tech

AR Coordinator, FDF/78

cc w/o enclosure:

N. Hallein, EM-42/CLOV

A. Tanner, OH/FEMP

D. Carr, FDF/52-2

J. Chiou, FDF/52-0

T. Crawford, FDF/52-0

A. Duarte, FDF/52-0

T. Hagen, FDF/65-2

J. Harmon, FDF/90

R. Heck, FDF/2

S. Hinnefeld, FDF/31

T. Walsh, FDF/65-2

ECDC, FDF/52-7

**RESPONSE TO U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL REVIEW COMMENT ON THE
VERIFICATION OF TREATMENT REPORT FOR
AREA 1, PHASE II TRAP RANGE STABILIZATION PROJECT
(629-SES-02211-005, REVISION 2)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: U.S. EPA

Section #: General

Pg. #: NA

Commentor: Saric

Line #: N/A

Original Comment #: 1

Comment: Concern that the DOE laboratory results for TCLP Metals are consistently lower than those reported by Severson Environmental Services (SES).

Response: Treatability studies conducted on firing range and trap range soils indicate a general trend towards lower TCLP metals concentrations with increased "cure time" of treated materials. In general, the laboratories used by Severson Environmental Services conducted TCLP extractions 1-2 days earlier than the DOE laboratory. The additional 1-2 day cure prior to TCLP extraction time is likely the source of the consistently lower values reported by the DOE laboratory. Furthermore, as noted by USEPA, another potential source of inconsistency for the two samples yielding results by the SES lab which were five times greater than the DOE laboratory's reported results is the heterogeneity of the trap range and firing range soils.

All analytical data including batch QC samples (ICV, CCV, ICB, CCB, MS, Dup, LCS, TCLP Extraction Blank, post spikes, and serial dilutions) reported by the DOE laboratory were validated against National Functional Guidelines and found to be acceptable. In addition, the DOE laboratory participates in several intercomparison programs which assess the laboratory's performance for the analysis of liquid samples for metals concentrations. These programs include APG (Analytical Products Group), DOE-MAPEP (Mixed Analyte Performance Evaluation Program), and EPA-QAP (Quality Assurance Program). Of the results submitted by the DOE laboratory for these programs, 99 percent fell within the acceptable range.

Action: None.

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE VERIFICATION OF TREATMENT REPORT
FOR AREA 1, PHASE II TRAP RANGE STABILIZATION PROJECT
(629-SES-02211-005, REVISION 2)**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.1

Page #: 4

Line #: Last Sentence

Code: C

Original Comment #: 1

Comment: This line incorrectly states that the Ohio EPA split three samples. Ohio EPA split 4 samples. Please correct.

Response: Agreed.

Action: This correction has been made and is attached for insertion into the report.

The sample homogenization technique was as follows:

1. Divide sample into quarters and thoroughly mix each quarter.
2. Combine two opposite quarters into halves and thoroughly mix each half.
3. Combine halves into one and thoroughly mix.
4. Return to Step 1 until sample has been mixed twice.
5. Place sample into applicable sample container for shipment to lab.

Each treatment/sampling grid was given a unique identification number. The samples were numbered sequentially by treatment grid, beginning with TG01-01 (Treatment Grid 1, Sample Number 1).

Ten percent (10%) of the samples were split with FDF and analyzed at their on-site laboratory. Four samples were also split with the Ohio Environmental Protection Agency on August 2, 1999.

2.2 Analytical Results

The verification samples were shipped overnight to Waste Stream Technology, Inc. (WST) in Buffalo, New York for offsite analysis by U.S. EPA SW-846 Method 6000/7000. The analytical results for the Trap Range samples are presented in Table 1.